

IMMANUEL HERRMANN, CELSIUS *PRO SE* CREDITOR

TO: THE HONORABLE CHIEF BANKRUPTCY JUDGE MARTIN GLENN
CC: CELSIUS NETWORK

November 22, 2022

Dear Chief Judge Glenn:

Pursuant to paragraph 27 of the Case Management Procedures, attached as Exhibit 1 to the Amended Final Order (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Granting Related Relief [Docket No. 1181], I write to request an extension of the deadline to object to the Debtors' Motion for Entry of an Order (I) Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [D.R. 1317] to Wednesday, November 30, 2022, at 11:59 p.m. (prevailing Eastern Time), which is approximately 12 hours before the UCC and lets them get the "last word" and be served before finalizing their reply. (See D.R. 1433 & 1434 for the UCC's unopposed extension.)

I have sought the consent of the Debtors, and they have denied my request. I need the extension for cause. First, relevant information comes out about the Debtor each day. Second, they have requested that all depositions be confidential, requiring me to meet and confer with the Debtor before including information from the depositions in my objection and any other court filings, thus introducing delays as we move into the Thanksgiving holiday. Third, because of the uncertainty surrounding the scheduling order and the timeline for adjudicating Earn disputes, including discovery issues, it has become an undue burden to juggle a response to the Debtors' exclusivity request, along with everything else.

Although I can only formally request a deadline extension for myself, I do expect a number of additional individual extension requests to come in if this is done on a one-off basis. Furthermore, I may be engaging legal services and/or form an *ad hoc* committee in the coming days. Other customers and *ad hoc* groups, new or existing, will likely want to respond and need more time to do so given everything else that is going on.

Therefore, in the interests of judicial economy, efficiency, uniform deadlines, and fairness, I humbly ask that Your Honor consider issuing an order extending the deadline for all parties in interest to 11:59pm on November 30, so long as it is timely served by email to the Debtor at CelsiusRx@kirkland.com.

Sincerely,

Immanuel Herrmann
Pro se Celsius creditor